

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR CONSPIRACY AND
THEFT OF FUNDS FROM A FEDERALLY-FUNDED PROGRAM**

UNITED STATES OF AMERICA	*		CRIMINAL NO.
v.	*		SECTION:
SAMANTHA T. CORNELIUS	*	VIOLATIONS:	18 U.S.C. § 371
	*		18 U.S.C. § 666(a)(1)(A)
	*		
*	*		*

The United States Attorney charges that:

COUNT 1–Conspiracy

A. AT ALL MATERIAL TIMES HEREIN:

1. The United States Department of Housing and Urban Development, an agency and department of the United States, awarded federally funded grants annually to state and local governments and other non-governmental organizations and agencies across the country to implement the Supportive Housing Program, a program designed to assist homeless individuals with free housing and life-skills training.

2. Beginning at a time unknown, but no later than on or about July 1, 2006 and continuing to on or about July 30, 2008, the House of Ruth was an organization that received in excess of \$10,000 in a one year period from a federally funded grant to implement the Supportive

Housing program provided by the Department of Housing and Urban Development in the Eastern District of Louisiana.

3. Part of the Supportive Housing Program grant money awarded to the House of Ruth was used to pay landlords of an eligible housing unit a deposit and rent for a period of one to three months for a homeless individual or family.

4. In or around March 2007 and continuing until on or about July 2008, in the Eastern District of Louisiana, the defendant, **SAMANTHA T. CORNELIUS** (“**CORNELIUS**”), was employed by the House of Ruth as a case manager for the Supportive Housing Program. She was responsible for approving landlords and units for homeless tenants and obtaining authorization from her supervisor at the House of Ruth to pay directly those qualifying landlords from the Supportive Housing Program grant.

B. THE CONSPIRACY:

From on or about May 23, 2007 through July 31, 2008, in the Eastern District of Louisiana, the defendant, **CORNELIUS**, and other known individuals, did knowingly and willfully combine, conspire, and confederate and agree to knowingly and willfully steal and obtain by fraud and intentionally misapply funds worth approximately \$109,702 owned by and under the care, custody, and control of the House of Ruth, in violation of Title 18, United States Code, Sections 666(a)(1)(A).

C. OVERT ACTS:

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Louisiana and elsewhere:

1. From May 23, 2007 through July 31, 2008, the defendant, **CORNELIUS**, issued 116 House of Ruth checks totaling \$109,702 to herself and others so that she and others could deposit those checks into their own bank accounts. Of these 116 checks, the defendant, **CORNELIUS**, deposited seventy-nine (79) House of Ruth checks, totaling \$78,296 into her ASI bank account, ending in 5420.

2. From May 15, 2007 to July 3, 2008, the defendant, **CORNELIUS**, distributed twenty (20) House of Ruth checks totaling \$16,935 to a co-conspirator who deposited the check into a Capital One bank account.

3. From June 1, 2007 to July 16, 2008, the defendant, **CORNELIUS**, distributed eight (8) House of Ruth checks totaling \$6,630 to a co-conspirator who deposited those checks into a Capital One bank account.

4. From July 31, 2007 to March 13, 2008, the defendant, **CORNELIUS**, distributed four (4) House of Ruth checks totaling \$3,321 to a co-conspirator, who deposited those checks into a Chase bank account.

5. From March 13, 2007 through July 14, 2008, the defendant, **CORNELIUS**, distributed five (5) House of Ruth checks totaling \$4,520 to other individuals, who deposited those checks into their respective bank accounts;

All in violation of Title 18, United States Code, Section 371.

COUNT 2

A. The allegations contained in Paragraph A of Count 1 of this Bill of Information, as set forth above, are realleged and incorporated by reference as though set forth in their entirety herein.

B. THEFT OF PROGRAM FUNDS:

From on or about May 23, 2007 through July 31, 2008, in the Eastern District of Louisiana, the defendant, **SAMANTHA T. CORNELIUS**, did knowingly and willfully embezzle, steal and obtain by fraud and intentionally misapply funds worth approximately \$109,702 owned by and under the care, custody, and control of the House of Ruth Supportive Housing Program, in violation of Title 18, United States Code, Section 666(a)(1)(A) and 2.

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New Orleans, Louisiana
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